

		FCC CapTel	
		Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
§ 64.604 B.5	Technology		
	<p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p>

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.6	Voicemail		
	Interactive Menus		
	<p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p>	Requirement applies.	<p>CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.</p>
	<p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p>	Requirement applies.	<p>CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.</p>
	<p>TRS will handle pay-per-calls.</p>		

FCC Requirement		FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Functional Standards			
§ 64.604 C.1	Consumer Complaint Logs	Requirement applies.	<p>Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p>
	States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.		
	States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.		

		FCC CapTel	
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
8 64.604 C.2	<p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	Requirement applies.	Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.

		FCC CapTel	
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 C.3	Public Access to Info		
	Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, and incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.
	Conduct ongoing education and outreach programs to publicize availability of 711 access.		

		FCC CapTel	
FCC Requirement		Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
§ 64.604 C.4	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	Requirement applies.	<p>CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>

FCC CapTel			
FCC Requirement		Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
8 64.604 C.5	<p>Jurisdictional Separation of Costs</p> <p>(1) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared funding cost recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>Requirement applies.</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>

		FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
FCC Requirement			
§ 64.604 C.6	Complaints		
	(i) Referral of complaint,	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
	(ii) Intrastate complaint resolution,		
	(iii) Jurisdiction of Commission,		
	(iv) Interstate complaint resolution,		
	(v) Complaint Procedures		

FCC CapTel			
FCC Requirement		Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
§ 64.604 C.7	<p>Treatment of TRS Customer Info</p> <p>Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.</p>	Requirement applies.	<p>Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.</p>

		FCC CapTel	
		Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
§ 64.605	State Certification		
	Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint CapTel will deliver the SS7 technology on February 1, 2004.

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Types of Calls	Two line VCO Two line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint CapTel supports the VCO calling combinations.
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.

		FCC CapTel	
	FCC Requirement	Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Answering Machine Retrieval	<p>Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users.</p> <p>Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.</p>	The requirement was not addressed in the Declaratory Ruling.	<p>Answering machine and voicemail retrieval is provided by CapTel.</p> <p>Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.</p>

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	<p>Concluded that call release is required under FCC's functional equivalency mandate.</p> <p>Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.</p>	Waived. (§ 52)	

		FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Speed Dialing	<p>Concluded that speed dialing feature is required under FCC's equivalency mandate.</p> <p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p>	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have the Speed Dial feature.

FCC CapTel			
	FCC Requirement	Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	<p>Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.</p> <p>The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways." One way is for the TRS consumer to request that the CA set up the call with two other parties.</p> <p>The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p>	<p>The requirement was not addressed in the Declaratory Ruling.</p>	<p>Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling. (For One-Line CapTel.)</p> <p>For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.</p>



Appendix L

**Sprint's Report to the FCC on
VRS and IP Waivers**

Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		time, no universal, cooperative methodology to address the internet deficiencies.				
2. Spanish Relay	NA	NA	NA	Compensable but non- mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP(VoIP) requires Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments	We are currently providing two-line VCO and HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					<p>owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call</p>	and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					back using three-way call feature. The procedure is similar to two- line VCO or HCO call.	
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated Number Identification process for information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	Sprint implemented a "manual" (directory assistance lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	No additional information to submit beyond our recent submission to the FCC. Current options may restrict interoperabilit y. An Emergency database is still in use today for subscribers who choose to register a profile; however,

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			would allow Internet Relay users to place 911 calls through Internet Relay.			agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexch ange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end- user billing mechanisms. Without automated knowledge of ANI location, and	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					without an ANI to charge back for tolls calls, Sprint cannot support equal access to interexchange carrier features for Video Relay Service.	the internet makes billing for toll calls obsolete.
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
8. Voice Carry Over (VCO) (one- line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						end user equipment.
9. Hearing Carry Over (HCO) (one- line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry- over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						through the broadband connection at end user equipment.
10. VCO - to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communicatio n between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because. the videoconferen cing via internet or ISDN protocols are not compatible.